

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION**

**ANNA KATHERINE PICKETT**

**PLAINTIFF**

**VS.**

**CAUSE NO.:** 2:18-cv-214-KS-MTP

**MISSISSIPPI BOARD OF ANIMAL HEALTH**

**DEFENDANT**

**JURY TRIAL DEMANDED**

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**COMPLAINT**

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This is an action to recover actual damages for retaliation in violation of Title VII. The following facts support this action:

1.

Plaintiff ANNA KATHERINE PICKETT is an adult resident citizen of Forrest County, Mississippi.

2.

Defendant MISSISSIPPI BOARD OF ANIMAL HEALTH (“MBAH”) is an agency of the State of Mississippi. Defendant may be served with process upon the Attorney General, Jim Hood, at Carroll Gartin Justice Building, 450 High Street, Jackson, Mississippi 39201, and upon Dr. Jim Watson, *de facto* Executive Director of MBAH, at 121 North Jefferson Street, Jackson, Mississippi 39201.

3.

This Court has federal question jurisdiction under 28 U.S.C. § 1331, for a cause of action arising under Title VII of the Civil Rights Act of 1964, and civil rights jurisdiction under 28

U.S.C. § 1343, for cause of action arising under the Civil Rights Act of 1964, as amended by the Civil Rights Act of 1991.

4.

Venue is proper in this Court pursuant to 28 U.S.C. § 1391 since Defendant is located within the United States District Court for the Southern District of Mississippi and the wrongful acts alleged in this action occurred within said District.

5.

Plaintiff Anna Pickett is a white female who had been employed at Sanderson Farms for approximately four (4) years as a broiler supervisor. She was the only female broiler supervisor employed at the facility.

6.

On or about December 27, 2016, Plaintiff was terminated from Sanderson Farms based on a false allegation that she had falsified documents. This reason was a pretext for sex discrimination. She was immediately replaced by a male. Furthermore, Defendant paid similarly-situated male employees more than Plaintiff.

7.

In March 2017, Plaintiff filed an EEOC charge alleging gender discrimination against Sanderson Farms, attached hereto as Exhibit "A."

8.

In June 2017, Plaintiff was hired by MBAH as a Poultry Epidemiologist. MBAH was aware that Plaintiff had been terminated by Sanderson Farms at the time that it hired her.

9.

In July 2017, Philip Stayer from Sanderson Farms contacted Dr. Watson from MBAH, and told Dr. Watson that Plaintiff had a lawsuit against Sanderson, and that her position with the State was a conflict of interest.

10.

Dr. Watson asked Plaintiff about having a lawsuit against Sanderson Farms, and Plaintiff truthfully told him that she had an EEOC charge against Sanderson Farms at that time. Dr. Watson told Plaintiff that it was not a conflict. *See* email exchange attached hereto as Exhibit “B.” However, after this, Plaintiff was treated differently by MBAH and she was told she was no longer trusted.

11.

On December 15, 2017, after receiving her right to sue letter, Plaintiff filed a lawsuit against Sanderson Farms, alleging *inter alia*, gender discrimination in violation of Title VII, attached hereto as Exhibit “C.”

12.

On April 16, 2018, Plaintiff was terminated by MBAH. Plaintiff was told it was because she was not a good fit, she was within her one year probationary period, and she could be terminated without cause. Plaintiff believed she was doing a good job with MBAH and, to her knowledge, she had not received any disciplinary action while working for MBAH. But for having previously filing an EEOC charge and lawsuit against Sanderson Farms, Plaintiff would not have been terminated.

13.

On April 27, 2018, Plaintiff filed an EEOC charge against MBAH claiming retaliation in being terminated for filing an EEOC charge and lawsuit against Sanderson Farms, attached hereto as Exhibit "D." On September 27, 2018, Plaintiff received her right to sue, attached hereto as Exhibit "E."

14.

Plaintiff was fired at MBAH because she claimed gender discrimination in an EEOC charge and lawsuit against Sanderson Farms. As such, MBAH is liable to Plaintiff for retaliation in violation of Title VII. As a result of Defendant's wrongful conduct, Plaintiff sustained lost wages, mental anxiety, and emotional distress damages.

**REQUEST FOR RELIEF**

Plaintiff requests an award of compensatory damages of lost income and mental anxiety and stress damages, in an amount to be determined by a jury, reinstatement, reasonable attorneys' fees, costs, and expenses. Plaintiff demands trial by jury.

RESPECTFULLY SUBMITTED, this the 12th day of December, 2018.

ANNA KATHERINE PICKETT, Plaintiff

By: /s/ JIM WAIDE  
Jim Waide (MS Bar No. 6857)  
Ron Woodruff (MS Bar No. 100391)  
waide@waidelaw.com  
Waide & Associates, P.A.  
332 North Spring Street  
Tupelo, MS 38804-3955  
Post Office Box 1357  
Tupelo, MS 38802-1357  
(662) 842-7324 / Telephone  
(662) 842-8056 / Facsimile

Attorneys for Plaintiff

STATE OF MISSISSIPPI

COUNTY OF Forrest

PERSONALLY came and appeared before me, the undersigned authority in and for the aforesaid jurisdiction, the within named ANNA KATHERINE PICKETT, who, after being first duly sworn, states under oath that the facts contained in the above and foregoing COMPLAINT are true and correct as stated therein.

  
ANNA KATHERINE PICKETT

GIVEN under my hand and official seal of office on this the 30<sup>th</sup> day of November, 2018.



  
NOTARY PUBLIC

My Commission Expires: 04/02/2022